

JHK/DMB:JPL
F.# 2009R01793

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

NAJIBULLAH ZAZI,
also known as "Salahuddin,"

Defendant.

S U P E R S E D I N G
I N F O R M A T I O N

Cr. No. 09-663 (S-1) (RJD)
(T. 18, U.S.C., §§
956(a)(1), 956(a)(2)(A),
2332a(a)(2),
2339B(a)(1),
2339B(d)(1)(A),
2339B(d)(1)(D),
2339B(d)(1)(E), 2 and
3551 et seq.)

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THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Conspiracy To Use Weapons Of Mass Destruction)

1. In or about and between September 2008 and September 2009, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant NAJIBULLAH ZAZI, also known as "Salahuddin," together with others, did knowingly and intentionally and without lawful authority conspire to use one or more weapons of mass destruction, to wit: explosive bombs and other similar explosive devices, against persons and property within the United States, and in furtherance of the offense: (1) facilities of interstate and foreign commerce, to wit: email and the internet, were used, (2) one or more perpetrators, to wit: the defendant NAJIBULLAH ZAZI and others, traveled in interstate and foreign commerce, and

(3) the offense and the results of the offense would have affected interstate and foreign commerce.

(Title 18, United States Code, Sections 2332a(a)(2) and 3551 et seq.)

COUNT TWO

(Conspiracy To Commit Murder In A Foreign Country)

2. In or about and between January 2008 and September 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere within the jurisdiction of the United States, the defendant NAJIBULLAH ZAZI, also known as "Salahuddin," together with others, did knowingly and intentionally conspire to commit one or more acts outside of the United States that would constitute the offense of murder if committed in the special maritime and territorial jurisdiction of the United States, and one or more of the conspirators did commit an act within the jurisdiction of the United States to effect an object of the conspiracy.

3. In furtherance of the conspiracy and to effect its objectives, the defendant NAJIBULLAH ZAZI, together with others, knowingly committed and caused to be committed, among others, the following:

OVERT ACT

a. On or about August 28, 2008, the defendant NAJIBULLAH ZAZI, together with others, boarded a flight at Newark Liberty International Airport to fly from Newark, New Jersey to Doha, Qatar and Peshawar, Pakistan.

(Title 18, United States Code, Sections 956(a)(1), 956(a)(2)(A) and 3551 et seq.)

COUNT THREE

(Providing Material Support
To A Foreign Terrorist Organization)

4. In or about and between September 2008 and September 2009, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant NAJIBULLAH ZAZI, also known as "Salahuddin," together with others, did knowingly and intentionally provide material support and resources, as defined in 18 U.S.C. § 2339A(b), including currency, training, communications equipment and personnel, to a foreign terrorist organization, to wit: al-Qaeda,

which has been designated by the Secretary of State as a foreign terrorist organization since 1999, pursuant to Section 219 of the Immigration and Nationality Act.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d)(1)(A), 2339B(d)(1)(D), 2339B(d)(1)(E), 2 and 3551 et seq.)



BENTON J. CAMPBELL
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EASTERN DISTRICT OF NEW YORK